

# EXHIBIT I

## Alpha Phi Alpha Fraternity, Inc. v. Raffensperger, Brad

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1 UNITED STATES DISTRICT COURT  
2 FOR THE NORTHERN DISTRICT OF GEORGIA  
3 ATLANTA DIVISION  
4

5 CASE NUMBER: 1:21-CV-05337-SCJ  
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7 ALPHA PHI ALPHA FRATERNITY INC., a nonprofit  
8 organization on behalf of members residing in  
9 Georgia; SIXTH DISTRICT OF THE AFRICAN  
10 METHODIST EPISCOPAL CHURCH, a Georgia  
11 Nonprofit organization; ERIC T. WOODS; KATIE  
12 BAILEY GLENN; PHIL BROWN; JANICE STEWART,  
13 PLAINTIFFS,  
14

15 V.  
16

17 BRAD RAFFENSPERGER, in his official capacity  
18 as Secretary of State of Georgia,  
19 DEFENDANT.  
20

21 DEPOSITION TESTIMONY OF:

22 Eric Woods

23 December 15, 2022

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1       you please state your full name for the  
2       record?

3             A.     Eric T. Woods.

4             Q.     And, Mr. Woods, what is your current  
5       address?

6             A.     [REDACTED] Tyrone, Georgia

7       [REDACTED].

8             Q.     And what county is that in?

9             A.     Fayette County.

10            Q.     How long have you lived at that  
11       address?

12            A.     Going on 15 years now.

13            Q.     And have you lived at any other  
14       address in the past two years?

15            A.     No.

16            Q.     Before moving to your current  
17       address 15 years ago, where did you live  
18       before that?

19            A.     I was in Jonesboro, Georgia.

20            Q.     And how long did you live in  
21       Jonesboro?

22            A.     On and off for about maybe seven  
23       years. I was -- I was stationed at Great

1       certifications.

2           Q.     Okay.   That was a little bit of a  
3       vague question.   Sorry about that.

4                   And right now, do you receive  
5       continuing education in any area?

6           A.     Yes.

7           Q.     And what is that?

8           A.     It would be Homeland Security  
9       exercises, plans and exercises.

10          Q.     And how often do you receive  
11       continuing education in that area?

12          A.     Annually.

13          Q.     Annually.

14                   And where do you receive that?

15          A.     Online.

16          Q.     And, currently, we -- we covered it  
17       a little bit, but just to confirm, aside from  
18       what we've already discussed or talked about,  
19       do you currently receive training in any  
20       other field or area?

21          A.     No.

22          Q.     All right.   We'll move along to talk  
23       about any organizations you're currently

1 and polling.

2 Q. And how about where you voted for  
3 the runoff; same place?

4 A. No, they -- it was a switch. So the  
5 runoff was at the old Tyrone police station,  
6 which is about a 50-year-old building with no  
7 running toilets.

8 Q. We touched on this a little bit with  
9 registration, but have you ever voted in any  
10 other state?

11 A. I'm going to say no, to give you --  
12 I'm going to say no.

13 Q. And do you consider yourself to be a  
14 member of the Democratic party?

15 A. Yes.

16 Q. And for how long would you say --  
17 consider yourself to be a member of the  
18 Democratic Party?

19 A. Since I was 18.

20 Q. Have you ever held any leadership  
21 positions in the Democratic Party?

22 A. No, sir.

23 Q. And have you ever held any position

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1 or served on any committee for the Democratic  
2 Party?

3 A. No, sir.

4 Q. And have you participated in any  
5 activities of the Democratic Party?

6 A. I'm sorry. You faded out again.  
7 Could you --

8 Q. Yes.

9 Have you ever participated in any  
10 activities for the Democratic Party?

11 A. Yes.

12 Q. And could you just describe briefly  
13 what those activities have been?

14 A. Yes. Voter registration.

15 Q. And how often would you say you  
16 participated in those activities?

17 A. Maybe every other election. There  
18 were several where I was deployed, so...

19 Q. And I presume, based on your prior  
20 answer, that this will be in the negative,  
21 but have you ever considered yourself to be a  
22 member of the Republican Party?

23 A. No, sir.

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1 Q. And would it be fair to say that you  
2 generally support Democratic candidates for  
3 election in Georgia?

4 A. Yes, sir.

5 Q. Have you ever voted for a Republican  
6 candidate?

7 A. No, sir.

8 Q. And, again, you probably answered  
9 this with your prior answers, but have you  
10 ever been a member, held a position, in any  
11 other political party?

12 A. No, sir.

13 Q. Have you worked on any political  
14 campaigns?

15 A. If you mean have I passed out flyers  
16 for prior Democratic presidents, yes.

17 Q. Yes, so for a specific candidate  
18 that you could point to and say, I helped on  
19 that campaign?

20 A. Yes, the Obama campaign.

21 Q. And would that have been in both --  
22 both elections that he ran?

23 A. Yes.